James W. Ehrman Admitted *pro hac vice* KOHRMAN JACKSON & KRANTZ PLL One Cleveland Center, 20th Floor 1375 East 9th Street Cleveland, Ohio 44114-1793 Telephone: (216) 696-8700

Telephone: (216) 696-8700 Facsimile: (216) 621-6536

Counsel for Sunnyside Automotive III, LLC d/b/a Saturn of Middleburg Heights, Sunnyside Automotive VI, LLC d/b/a Saturn of North Olmsted Sunnyside Automotive XVII, LLC d/b/a Saturn of Mentor, and Sunnyside Automotive XVIII, LLC d/b/a Saturn of Chagrin

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	)	
In re:	)	Chapter 11 Case No.
	)	-
GENERAL MOTORS CORP., et al.,	)	09-50026 (REG)
	)	
Debtors.	)	(Jointly Administered)
	)	

## **VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019(a)**

James W. Ehrman ("**Ehrman**") of Kohrman Jackson & Krantz PLL ("**KJK**") files, pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure, this verified statement of KJK's multiple representations in this case:

- 1. The names and addresses of the creditors represented by Ehrman and KJK are:
  - A. Sunnyside Automotive III, LLC d/b/a Saturn of Middleburg Heights
    7700 Pearl Road
    Middleburg Heights, Ohio 44130
  - B. Sunnyside Automotive VI, LLC d/b/a Saturn of North Olmsted 7700 Pearl Road Middleburg Heights, Ohio 44130
  - C. Sunnyside Automotive XVII, LLC d/b/a Saturn of Mentor 7700 Pearl Road

09-50026-mg Doc 2391 Filed 06/24/09 Entered 06/24/09 14:09:54 Main Document Pg 2 of 3

Middleburg Heights, Ohio 44130

- Sunnyside Automotive XVIII, LLC d/b/a Saturn of Chagrin
  7700 Pearl Road
  Middleburg Heights, Ohio 44130
- 2. The nature and amount of the claims and interests of the entities named in paragraph no. 1 hereof (the "Sunnyside Dealerships") and the time of acquisition of said claims and interests are as follows: Each of the Sunnyside Dealerships is a party to a Saturn Distribution Corporation Retailer Agreement in which the other party is Saturn Distribution Corporation (the Debtor in Case No. 09-50028-reg) which is a wholly owned subsidiary of Saturn Corporation (the Debtor in Case No. 09-50027-reg). The effective dates of the agreements are (a) with respect to Sunnyside Automotive III, the 20th day of May, 2008; (b) with respect to Sunnyside Automotive VI, the 20th day of May, 2008; (c) with respect to Sunnyside Automotive XVIII, the 15th day of October, 2007; and (d) with respect to Sunnyside Automotive XVIII, the 15th day of October, 2007. Each of the Sunnyside Dealerships have unsecured claims arising from said agreements.
- 3. The Sunnyside Dealerships are long-time clients of KJK; they retained Ehrman and KJK to represent them in these cases in April 2009.

James W. Ehrman

STATE OF OHIO

SS:

COUNTY OF CUYAHOGA

Affirmed and subscribed in my presence at <u>CLEVELAND</u>, Ohio the day of June, 2009.

Notary Public

OTARY PUBLIC-STATE OF OHIOMY Commission Expires

, ormer 10, 2013

Dated: June 24, 2009 Respectfully submitted,

/s/ James W. Ehrman

James W. Ehrman (Ohio ID #0011006) Admitted *pro hac vice* KOHRMAN JACKSON & KRANTZ PLL One Cleveland Center, 20th Floor 1375 East Ninth Street Cleveland, Ohio 44114-1793 Telephone: (216) 696-8700

Telecopier: (216) 621-6536

Email: jwe@kjk.com

Counsel for Sunnyside Automotive III, LLC, Sunnyside Automotive VI, LLC, Sunnyside Automotive XVII, LLC, and Sunnyside

Automotive XVIII, LLC